

Hello Julie,

I support the IA and the ASIC viewpoints below. Please use our industry professionals recommendations when updating the MWELO

Thank You,

Chad Sutton

From the IA”

Precipitation Rate Limits

The proposed changes include a limit on precipitation rates of 1.0 inches per hour.

How Will This Affect You?

By adding a prescriptive limit on precipitation rates, the MWELO hinders past, current and future innovation on irrigation technologies and limits what products can be used in irrigation designs and installations.

What Is the Irrigation Association’s View?

Limiting precipitation rates will have unintended detrimental effects to the efficiency of the irrigation system, and some efficient products currently available will be eliminated from use. DWR’s goal of prohibiting any runoff and overspray in the landscape is a concept IA supports, but we believe that this goal can be met without setting a limit on precipitation rate. Limiting precipitation rate will have no effect on overspray or runoff if the system is not designed and installed correctly. IA recommends using the precipitation rate to develop the correct run time for proper irrigation scheduling and management.

Irrigation Efficiency & ET Adjustment Factor

The proposed changes include a significant increase to “irrigation efficiency” by requiring 0.85 for residential areas and 0.92 for non-residential areas and a decrease in the ET adjustment factor by requiring 0.5 for residential areas and 0.4 for non-residential areas.

How Will This Affect You?

Because irrigation efficiency is based on distribution uniformity, there is no combination of irrigation products available on the market today that will achieve the requirements proposed in the draft ordinance. This also results in an unattainable ET adjustment factor.

What Is the Irrigation Association’s View?

While the Irrigation Association believes in irrigation efficiency as a crucial component to water conservation, these levels stated in the draft are not achievable. IA recommends that the

irrigation efficiency requirement be 0.75 as recommended in the American Society of Irrigation Consultants and Irrigation Association Landscape Irrigation [best management practices document](#) released in May 2014.

The ET adjustment factor should stay at current levels. Changing an ETAF for new landscape installations will not have an immediate effect on water savings. Instead of changing the ETAF, IA believes there are better options to achieve water savings through irrigation water measurement and enforcement of ETAF levels in the current ordinance.

Submit Your Comments

DWR needs to hear directly from experts in the irrigation industry about the updated MWEL. Before COB on **Friday, June 26**, submit your comments to Julie Saare-Edmonds at julie.saare-edmonds@water.ca.gov